



United States
Environmental Protection
Agency Region 2

Division of Enforcement and Compliance Assistance
290 Broadway, 21st Floor
New York, New York 10007-1866

Self Assessment Checklist: Safe Disposal of Motor Vehicle Air Conditioners

- | | Yes | No | |
|---|--------------------------|--------------------------|--|
| 1. | <input type="checkbox"/> | <input type="checkbox"/> | Do you take the final step in the disposal process of motor vehicle air conditioners (MVACs)?
<i>If yes, you are subject to the safe disposal requirements under Section 608 and Section 609 of the CAA. If no, stop.</i> |
| <p>Note: EPA believes that persons who handle appliances in a manner that would likely result in the release of refrigerant are, in fact, taking the final step in the disposal process. Examples of the handling of appliances that would be considered the “final step” include discharge, deposit, dumping, or placing of a discarded appliance; disassembly for purposes of reuse or discard of component parts of an appliance, or crushing an appliance prior to shipment or delivery to another disposal facility.</p> | | | |
| 2. | | | Estimate your weekly volume of MVACs received? |
| | <input type="checkbox"/> | <input type="checkbox"/> | 0 - 10 20 - 30 40 - 50 |
| | <input type="checkbox"/> | <input type="checkbox"/> | 10 - 20 30 - 40 50+ |
| 3. | <input type="checkbox"/> | <input type="checkbox"/> | Do you accept MVACs with the refrigerant charge intact? <i>If no, go to question # 16.</i> |
| 4. | | | Who recovers the refrigerant from the MVAC at your facility? <i>Check all that apply.</i> |
| | <input type="checkbox"/> | | a. owner, operator, employee of the disposal facility |
| | <input type="checkbox"/> | | b. contractor to the disposal facility |
| | <input type="checkbox"/> | | c. technicians who service MVACs |
| <p><i>If you checked yes to c - only, skip to question # 14, otherwise continue.</i></p> | | | |
| 5. | <input type="checkbox"/> | <input type="checkbox"/> | * Does the facility own recovery equipment? |
| 6. | | | For each piece of recovery equipment, record the manufacturer's name, the year manufactured, the model and serial number and the rated refrigerants? <i>See Form A.</i> |
| 7. | <input type="checkbox"/> | <input type="checkbox"/> | * Have you submitted to EPA a recovery equipment certification form? <i>If no, a copy of the form can be downloaded from EPA Region 2's website at http://www.epa.gov/region02/cfc/rshome.htm or obtained by calling the Stratospheric Ozone Hotline at 1-800-296-1996.</i> |
| 8. | <input type="checkbox"/> | <input type="checkbox"/> | * When you recover refrigerant from MVACs, do you reduce the system pressure to or below 102 mm of mercury vacuum? |

9. ☐ ☐* Does your facility send recovered refrigerant to either:
- a. an EPA-approved reclamation facility (A list of EPA Certified Reclaimers can be downloaded from EPA Region 2's website at <http://www.epa.gov/region02/cfc/rshome.htm> or obtained by calling the Stratospheric Ozone Hotline at 1-800-296-1996); or
- b. a facility that services MVACs.
- If b, continue. Otherwise, skip to question # 13 .*
10. ☐ ☐* Is your recovery equipment certified under Section 609 of the Clean Air Act? A list of EPA-approved equipment can be downloaded from EPA Region 2's website at <http://www.epa.gov/region02/cfc/rshome.htm> or obtained by calling the Stratospheric Ozone Hotline at 1-800-296-1996.
11. ☐ ☐* Are you selling the refrigerant to technicians who are trained and certified under Section 609 of the Clean Air Act? A list of EPA-approved Section 609 certifying organizations can be downloaded from EPA Region 2's website at <http://www.epa.gov/region02/cfc/rshome.htm> or obtained by calling the Stratospheric Ozone Hotline at 1-800-296-1996.
12. ☐ ☐* Do you retain invoices that indicate the name of the purchaser, the date of sale, and the quantity of the refrigerant purchased?
13. ☐ ☐ Do you allow MVAC service technicians to recover (i.e., remove refrigerant in any condition from an appliance and store it in a container without testing or processing) refrigerant at your facility? *If no, skip to question 16, otherwise continue.*
14. ☐ ☐* Are the technicians trained and certified under Section 609 of the Clean Air Act? A list of EPA-approved Section 609 certifying organizations can be downloaded from EPA Region 2's website at <http://www.epa.gov/region02/cfc/rshome.htm> or obtained by calling the Stratospheric Ozone Hotline at 1-800-296-1996.
15. ☐ ☐* Are the technicians using recovery equipment certified under Section 609 of the Clean Air Act? A list of EPA-approved equipment can be downloaded from EPA Region 2's website at <http://www.epa.gov/region02/cfc/rshome.htm> or obtained by calling the Stratospheric Ozone Hotline at 1-800-296-1996.
16. ☐ ☐ Do you accept MVACs where the refrigerant has been evacuated from the appliance previously? *If no, stop.*
17. ☐ ☐* Do you verify that the refrigerant has been evacuated from the appliance previously by either:
- a. accepting a signed statement from the person delivering the appliance that all refrigerant that had not leaked previously has been properly recovered from the appliance (This statement must include the name and address of the person who recovered the refrigerant and the date the refrigerant was recovered); or
- b. establishing a contract with suppliers that refrigerant will be removed prior to delivery.
18. ☐ ☐* Have you notified the suppliers of your appliances that refrigerant must be properly removed before the delivery of the items to the facility (e.g warning signs, letters to suppliers)?

19. ☐ ☐* Do you keep your verification statements and/or contracts with suppliers at the facility for three years?

Note: If you checked any of the boxes that are starred, you may be out of compliance with Section 608 and/or Section 609 of the Clean Air Act. If you voluntarily disclose to EPA any of the violations found through the use of this checklist, you may eliminate or substantially reduce the penalties associated with these violations. For more information about these potential penalty reductions, call EPA Region 2's Compliance Assistance and Program Support Branch at 212-637-4050.

Disclaimer: The statements in this checklist are intended solely as guidance to aid regulated entities in complying with Section 608 and Section 609 of the Clean Air Act. The checklist is not a substitute for reading the regulation and understanding all its requirements as it applies to your facility. EPA may decide to update this checklist without public notice to reflect changes in EPA's approach to implementing Section 608 and Section 609 of the Clean Air Act or to clarify and update text. To determine whether EPA has revised this checklist and/or to obtain copies, contact EPA Region 2's Compliance Assistance and Program Support Branch at 212-637-4050 or visit our webpage at: <http://www.epa.gov/region02/cfc/rshome.htm>

**FORM A -
Recovery/Recycle Equipment Inventory**

Name of Recovery Equipment:	
Manufacturer:	
Model #:	
Serial #:	
Date of Manufacture:	
Refrigerant types:	

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Serial #:	
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